

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

THE CITY OF HUNTINGTON,  
Plaintiff,

v.

CIVIL ACTION NO. 3:17-01362

AMERISOURCEBERGEN  
DRUG CORPORATION, et al.,  
Defendants.

---

CABELL COUNTY COMMISSION,  
Plaintiff,

v.

CIVIL ACTION NO. 3:17-01665

AMERISOURCEBERGEN  
DRUG CORPORATION, et al.,  
Defendants.

---

**AMENDED NOTICE OF REMOTE DEPOSITION OF DR. G. CALEB ALEXANDER**

Defendants AmerisourceBergen Drug Corporation, Cardinal Health, Inc., and McKesson Corporation, by and through counsel, hereby give notice that the remote, oral videotaped deposition of Dr. G. Caleb Alexander will take place on September 18, 2020, beginning at 9:30 a.m. Eastern Time. The deposition shall be videotaped and recorded stenographically and will be conducted before a notary public or other person authorized to administer oaths. Court reporting services and video recording services will be provided by Veritext Legal Solutions (216-523-1313; opioid@veritext.com), who will provide remote access for all parties wishing to participate via video conference or telephone.

Defendants request production of the following in advance of the deposition: An itemization of the hours spent and expected to be spent, and compensation paid and expected to be

paid, for the Deponent's work and for each member of the Deponent's support team's work in this matter, including all invoices submitted to counsel.

PLEASE TAKE FURTHER NOTICE that the Deponent must have access to a laptop, computer, or tablet with web camera capability. Deponent may not use a cell phone to provide testimony. Deponent must also have the capability to view documents electronically. To the extent Deponent is not in possession of the required technology, documents shall be provided to the Deponent in hardcopy and/or Deponent's counsel shall provide the required technology. Recommended Specifications are below:

- i. Computer
- ii. Web Camera
- iii. Internet Browser (Google Chrome Preferred)
- iv. Minimum 10 mb/s wired, secure internet connection

At minimum, Deponent must have sufficient internet connectivity and bandwidth to support a video deposition. Such capacity shall be sufficient to ensure that when used with the system selected for the deposition, there shall be (a) high-quality video upload (from Deponent) and download (to other Participants), (b) no material time discrepancy between audio and video, and (c) consistent connectivity, with no material disruptions.

Dated: September 2, 2020

Respectfully submitted,

**AmerisourceBergen Drug Corporation**  
By Counsel:

/s/ Gretchen M. Callas  
Gretchen M. Callas (WVSB #7136)  
JACKSON KELLY PLLC  
Post Office Box 553  
Charleston, West Virginia 25322  
Tel: (304) 340-1000  
Fax: (304) 340-1050  
gcallas@jacksonkelly.com

Robert A. Nicholas  
Shannon E. McClure  
REED SMITH LLP  
Three Logan Square  
1717 Arch Street, Suite 3100  
Philadelphia, PA 19103  
Tel: (215) 851-8100  
Fax: (215) 851-1420  
[rnickolas@reedsmit.com](mailto:rnickolas@reedsmit.com)  
[smcclure@reedsmit.com](mailto:smcclure@reedsmit.com)

***Cardinal Health, Inc.***  
By Counsel:

/s/ Michael W. Carey  
Michael W. Carey (WVSB #635)  
David R. Pogue (WVSB #10806)  
Steven R. Ruby (WVSB #10752)  
Raymond S. Franks II (WVSB #6523)  
Carey, Scott, Douglas & Kessler, PLLC  
901 Chase Tower, 707 Virginia Street, East  
P.O. Box 913  
Charleston, WV 25323  
Telephone: (304) 345-1234  
[mwcarey@csdlawfirm.com](mailto:mwcarey@csdlawfirm.com)  
[drpogue@csdlawfirm.com](mailto:drpogue@csdlawfirm.com)  
[sruby@cdkrlaw.com](mailto:sruby@cdkrlaw.com)  
[rfranks@cdkrlaw.com](mailto:rfranks@cdkrlaw.com)

/s/ Enu Mainigi  
Enu Mainigi  
F. Lane Heard III  
Ashley W. Hardin  
WILLIAMS & CONNOLLY LLP  
725 Twelfth Street NW  
Washington, DC 20005  
Tel: (202) 434-5000  
Fax: (202) 434-5029  
[emainigi@wc.com](mailto:emainigi@wc.com)  
[lheard@wc.com](mailto:lheard@wc.com)  
[ahardin@wc.com](mailto:ahardin@wc.com)

***McKesson Corporation***  
By Counsel:

/s/ Jeffrey M. Wakefield  
Jeffrey M. Wakefield (WVSB #3894)  
jwakefield@flahertylegal.com  
Jason L. Holliday (WVSB #12749)  
jholliday@flahertylegal.com  
FLAHERTY SENSABAUGH BONASSO PLLC  
P.O. Box. 3843  
Charleston, WV 25338-3843  
Telephone: (304) 345-0200

/s/ Geoffrey E. Hobart  
Geoffrey E. Hobart  
Mark H. Lynch  
Christian J. Pistilli  
Laura Flahive Wu  
COVINGTON & BURLING LLP  
One CityCenter  
850 Tenth Street NW  
Washington, DC 20001  
Tel: (202) 662-5281  
ghobart@cov.com  
mlynch@cov.com  
cpistilli@cov.com  
lflahivewu@cov.com

**CERTIFICATE OF SERVICE**

I hereby certify that on September 2, 2020, the foregoing ***Amended Notice of Remote Deposition of Dr. G. Caleb Alexander*** was sent to counsel for the Plaintiffs and Defendants using the Court's CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Gretchen M. Callas

Gretchen M. Callas (WVSB # 7136)